

Van Arkel, Matt

Subject: [External] RE: 2022 Long-Term Renewable Resources Procurement Plan

From: Eric Pasi <ericp@ips-solar.com>

Sent: Monday, February 28, 2022 7:33 PM

To: IPA.ContactUs <IPA.ContactUs@Illinois.gov>

Cc: Kristen Peterson <kristenp@ips-solar.com>; Josh Anderson <josha@ips-solar.com>

Subject: [External] RE: 2022 Long-Term Renewable Resources Procurement Plan

TO: Illinois Power Agency
105 W Madison Street, Suite 1401
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FROM: Eric Pasi, Impact Power Solutions (IPS)

RE: 2022 Long-Term Renewable Resources Procurement Plan

DATE: February 28, 2022

Impact Power Solutions (IPS) appreciates this opportunity to submit comments in response to the Illinois Power Agency's Jan 13th 2022 Long-Term Renewable Resources Procurement Plan (LTRRPP) Draft for Public Comment. IPS hereby submits these comments regarding the proposed changes made to the Illinois Renewable Portfolio Standard enacted through Public Act 102-0662 (the "Climate and Equitable Jobs Act").

For over 30 years, we have worked to deliver customers solutions ranging from rooftop installations to multi-megawatt community solar gardens. To date we've developed, constructed, or collaborated directly on nearly 200 megawatts of community solar projects nationwide. Specifically in Illinois we've participated in nearly 50 megawatts of constructed or REC-awarded projects across the state. IPS has also been a leader in equitable solar development on community solar projects in North Minneapolis, solar projects for tribal lands, and workforce development to bring jobs to underserved communities.

Impact Power Solutions is in agreement with the Joint Solar Parties on a substantial majority of their feedback to the IPA; however, we differ on a key few points. In Section 7.4.3 we believe that project selection should not unfairly disadvantage developments that are new to the program. Within the last few weeks the JSP circulated different ideas and previously coalesced around the concept of eliminating certain scoring criteria in favor of a time-based mechanism to rank-order projects based on when they received their non-ministerial permits, site control, and interconnection agreement. Older interconnection agreements will need to be re-signed before the new project qualification deadline, so this proposal seemed to reasonably allow for new projects to compete on equal footing with old ones.

However, there are two concurrent issues: one originally proposed by the IPA in its draft filing, and one being suggested by the JSP that undermines new developers and new projects.

1. In its draft filing the IPA proposes that additional points be available to projects that qualified under the previous program (page 155 of the Draft 2022 Long-Term Plan). This will stymie new development, hinder land owners who didn't participate in the first program from participating now, and overtly bar new developers from becoming involved with the traditional community solar program.
2. A new suggestion by the JSP to provide favorable scoring based on land use may have unintended consequences. If, as the JSP suggests, 3 or more points would be allocated to projects located on previously developed land, project applications intending to co-locate with existing community solar projects may be unduly advantaged, unless explicitly restricted by the IPA.

Replace the points for the first system in a county or township with a preference for previously developed land put to non-agrarian use (which would include both active sites and brownfields/abandoned property).

Public Act 102-0662 added a new provision related to the co-location of community solar projects: "projects shall not be colocated with one or more other community renewable generation projects, as defined in the Agency's first revised long-term renewable resources procurement plan approved by the Commission on February 18, 2020, such that the aggregate nameplate capacity exceeds 5,000 kilowatts" (pg. 178).

This could then allow a loophole for advantaged projects, up to 3,000 kilowatts, to be co-located on a previously developed community solar property.

In summation IPS has been and will continue to be an ardent supporter of Illinois solar in all forms. We believe that the new rules and guidelines set forth by the IPA should be equitable and fair regardless of whether developers have been involved for years like IPS or are new entities seeking to participate. New projects can be designed to reflect the most recent goals of CEJA, which we believe will lead to a more equitable outcome for the program as a whole.

Best Regards,

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